

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

WORDCHECK TECH, LLC

Plaintiff,

v.

ALT-N TECHNOLOGIES, LTD.; APPRIVER LLC;
ATHENA ARCHIVER, INC.; AWARENESS
TECHNOLOGIES, INC.; AXS- ONE, INC.;
BITDEFENDER LLC; BLUE COAT SYSTEMS, INC.;
CA, INC. D/B/A CA TECHNOLOGIES; CHECK POINT
SOFTWARE TECHNOLOGIES, INC.; CHECK POINT
SOFTWARE, LLC; CODE GREEN NETWORKS
INTERNATIONAL, INC. ; CODE GREEN NETWORKS,
INC.; COMPUTER ASSOCIATES INTERNATIONAL,
INC.; COMPUTER MAIL SERVICES, INC.; ELECTRIC
MAIL (INTERNATIONAL) L.P.; EMC CORPORATION;
ENTRUST, INC. D/B/A ENTRUST TECHNOLOGIES,
INC.; ESOF, INC.; FACETIME COMMUNICATIONS,
INC.; FIDELIS SECURITY SYSTEMS, INC.;
FORTINET, INC.; GFI SOFTWARE DEVELOPMENT,
LTD.; GFI USA, INC.; GLOBAL RELAY
COMMUNICATIONS, INC.; GLOBAL RELAY USA,
INC.; GTB TECHNOLOGIES, INC.; INTEG, INC.;
IRON MOUNTAIN INC. D/B/A IRON MOUNTAIN
COMPANY; ITECH, INC.; J2 GLOBAL
COMMUNICATIONS, INC.; LIVEOFFICE HOLDINGS,
LLC; LIVEOFFICE, LLC; MICROWORLD
TECHNOLOGIES, INC.; MIMICAST NORTH
AMERICA, INC.; MIMICAST SERVICES LTD.;
MIMICAST, LTD.; MIMOSA SYSTEMS, INC.;
PALISADE SYSTEMS, INC.; PERMESSA
CORPORATION; QUEST SOFTWARE, INC.; RED
EARTH SOFTWARE (UK) LTD.; RED EARTH
SOFTWARE, INC.; ROCKLIFFE SYSTEMS D/B/A
ROCKLIFFE SYSTEMS, INC. D/B/A ROCKLIFFE, INC.
D/B/A MAILSITE, INC.; RSA SECURITY, INC.; RSA
SECURITY, LLC; SAFENET, INC.; SHERPA
SOFTWARE GROUP, INC. D/B/A SHERPA
SOFTWARE; SHERPA SOFTWARE GROUP, L.P.
A/K/A SHERPA SOFTWARE PARTNERS, L.P. D/B/A
SHERPA SOFTWARE; SMARSH, INC.; SOLINUS, INC.

Civil Action No. 6:10-CV-457

JURY TRIAL DEMANDED

D/B/A MAILFOUNDRY; ST. BERNARD SOFTWARE, INC.; THE ELECTRIC MAIL COMPANY; TRUSTWAVE CORPORATION; TRUSTWAVE HOLDINGS, INC.; UNIFY CORPORATION; VERDASYS INC.; VERICEPT CORPORATION; VIRTUALCONNECT TECHNOLOGIES, INC.; WATCHGUARD TECHNOLOGIES, INC.; WATERFORD TECHNOLOGIES GROUP, LTD. D/B/A WATERFORD TECHNOLOGIES GROUP; WATERFORD TECHNOLOGIES, INC. D/B/A SEATTLELAB, INC. D/B/A SEATTLELAB; WORKSHARE TECHNOLOGY, INC. D/B/A WORKSHARE, INC.; ZL TECHNOLOGIES, INC.; and ZSCALER, INC.

Defendants,

**DEFENDANT SAFENET, INC.'S ORIGINAL ANSWER AND
COUNTERCLAIM TO PLAINTIFF'S COMPLAINT**

Defendant SafeNet, Inc. ("SafeNet") files this Answer and Counterclaim ("Answer") to the Complaint ("Complaint") for Patent Infringement filed by WordCheck Tech, LLC ("WordCheck Tech or Plaintiff"). As explained more fully in its Answer, among other defenses to Plaintiff's Complaint, SafeNet denies that it has infringed any valid and enforceable claim of U.S. Patent No. 6,782,510 (the "510 Patent"). Moreover, SafeNet denies any and all allegations of the Complaint not specifically admitted herein.

PARTIES

1. SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 1 of the Complaint, and therefore denies them.
2. The allegations of Paragraph 2 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 2 of the Complaint, and therefore denies them.

3. The allegations of Paragraph 3 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 3 of the Complaint, and therefore denies them.

4. The allegations of Paragraph 4 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 4 of the Complaint, and therefore denies them.

5. The allegations of Paragraph 5 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 5 of the Complaint, and therefore denies them.

6. The allegations of Paragraph 6 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 6 of the Complaint, and therefore denies them.

7. The allegations of Paragraph 7 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 7 of the Complaint, and therefore denies them.

8. The allegations of Paragraph 8 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 8 of the Complaint, and therefore denies them.

9. The allegations of Paragraph 9 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 9 of the Complaint, and therefore denies them.

10. The allegations of Paragraph 10 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 10 of the Complaint, and therefore denies them.

11. The allegations of Paragraph 11 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 11 of the Complaint, and therefore denies them.

12. The allegations of Paragraph 12 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 12 of the Complaint, and therefore denies them.

13. The allegations of Paragraph 13 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 13 of the Complaint, and therefore denies them.

14. The allegations of Paragraph 14 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 14 of the Complaint, and therefore denies them.

15. The allegations of Paragraph 15 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 15 of the Complaint, and therefore denies them.

16. The allegations of Paragraph 16 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 16 of the Complaint, and therefore denies them.

17. The allegations of Paragraph 17 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 17 of the Complaint, and therefore denies them.

18. The allegations of Paragraph 18 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 18 of the Complaint, and therefore denies them.

19. The allegations of Paragraph 19 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 19 of the Complaint, and therefore denies them.

20. The allegations of Paragraph 20 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 20 of the Complaint, and therefore denies them.

21. The allegations of Paragraph 21 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 21 of the Complaint, and therefore denies them.

22. The allegations of Paragraph 22 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 22 of the Complaint, and therefore denies them.

23. The allegations of Paragraph 23 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 23 of the Complaint, and therefore denies them.

24. The allegations of Paragraph 24 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 24 of the Complaint, and therefore denies them.

25. The allegations of Paragraph 25 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 25 of the Complaint, and therefore denies them.

26. The allegations of Paragraph 26 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 26 of the Complaint, and therefore denies them.

27. The allegations of Paragraph 27 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 27 of the Complaint, and therefore denies them.

28. The allegations of Paragraph 28 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 28 of the Complaint, and therefore denies them.

29. The allegations of Paragraph 29 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 29 of the Complaint, and therefore denies them.

30. The allegations of Paragraph 30 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 30 of the Complaint, and therefore denies them.

31. The allegations of Paragraph 31 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 31 of the Complaint, and therefore denies them.

32. The allegations of Paragraph 32 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 32 of the Complaint, and therefore denies them.

33. The allegations of Paragraph 33 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 33 of the Complaint, and therefore denies them.

34. The allegations of Paragraph 34 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 34 of the Complaint, and therefore denies them.

35. The allegations of Paragraph 35 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 35 of the Complaint, and therefore denies them.

36. The allegations of Paragraph 36 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 36 of the Complaint, and therefore denies them.

37. The allegations of Paragraph 37 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 37 of the Complaint, and therefore denies them.

38. The allegations of Paragraph 38 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 38 of the Complaint, and therefore denies them.

39. The allegations of Paragraph 39 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 39 of the Complaint, and therefore denies them.

40. The allegations of Paragraph 40 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 40 of the Complaint, and therefore denies them.

41. The allegations of Paragraph 41 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 41 of the Complaint, and therefore denies them.

42. The allegations of Paragraph 42 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 42 of the Complaint, and therefore denies them.

43. The allegations of Paragraph 43 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 43 of the Complaint, and therefore denies them.

44. The allegations of Paragraph 44 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 44 of the Complaint, and therefore denies them.

45. The allegations of Paragraph 45 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 45 of the Complaint, and therefore denies them.

46. The allegations of Paragraph 46 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 46 of the Complaint, and therefore denies them.

47. SafeNet admits the allegations of this paragraph of the Complaint.

48. The allegations of Paragraph 48 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 48 of the Complaint, and therefore denies them.

49. The allegations of Paragraph 49 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 49 of the Complaint, and therefore denies them.

50. The allegations of Paragraph 50 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 50 of the Complaint, and therefore denies them.

51. The allegations of Paragraph 51 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 51 of the Complaint, and therefore denies them.

52. The allegations of Paragraph 52 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 52 of the Complaint, and therefore denies them.

53. The allegations of Paragraph 53 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 53 of the Complaint, and therefore denies them.

54. The allegations of Paragraph 54 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 54 of the Complaint, and therefore denies them.

55. The allegations of Paragraph 55 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 55 of the Complaint, and therefore denies them.

56. The allegations of Paragraph 56 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 56 of the Complaint, and therefore denies them.

57. The allegations of Paragraph 57 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 57 of the Complaint, and therefore denies them.

58. The allegations of Paragraph 58 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 58 of the Complaint, and therefore denies them.

59. The allegations of Paragraph 59 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 59 of the Complaint, and therefore denies them.

60. The allegations of Paragraph 60 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 60 of the Complaint, and therefore denies them.

61. The allegations of Paragraph 61 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 61 of the Complaint, and therefore denies them.

62. The allegations of Paragraph 62 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 62 of the Complaint, and therefore denies them.

63. The allegations of Paragraph 63 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 63 of the Complaint, and therefore denies them.

64. The allegations of Paragraph 64 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 64 of the Complaint, and therefore denies them.

65. The allegations of Paragraph 65 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 65 of the Complaint, and therefore denies them.

JURISDICTION AND VENUE

66. SafeNet admits that this action purports to arise under Title 35 of the United States Code, and that the Court has subject matter jurisdiction pursuant to U.S.C. §§ 1331 and 1338(a). Solely for the purposes of this action, SafeNet admits only that this Court has personal jurisdiction over SafeNet and that SafeNet conducts business in the Eastern District of Texas.

SafeNet denies that SafeNet has infringed (directly or indirectly) the ‘510 Patent anywhere, including within the Eastern District of Texas. SafeNet admits that SafeNet has a website which is accessible from the Eastern District of Texas. SafeNet denies the remaining allegations of Paragraph 66 to the extent they are directed at SafeNet. To the extent the allegations of Paragraph 66 are directed to other entities, SafeNet lacks sufficient information to form a belief as to their truth or falsity of the allegations, and therefore denies them.

67. Reserving all rights pursuant to 28 U.S.C. § 1404(a), SafeNet admits that venue is proper in the Eastern District of Texas under 28 U.S.C. §§ 1391(b)-(c). SafeNet denies that SafeNet has infringed (directly or indirectly) the ‘510 Patent anywhere, including within the Eastern District of Texas. Solely for the purposes of this action, SafeNet admits only that this Court has personal jurisdiction over SafeNet and that SafeNet conducts business in the Eastern District of Texas. SafeNet admits that SafeNet has a website which is accessible from the Eastern District of Texas. SafeNet denies the remaining allegations of Paragraph 67 to the extent they are directed at SafeNet. To the extent the allegations of Paragraph 67 are directed to other entities, SafeNet lacks sufficient information to form a belief as to their truth or falsity of the allegations, and therefore denies them.

COUNT I

ALLEGED INFRINGEMENT OF U.S. PATENT NO. 6,782,510

68. SafeNet admits that the face of the ‘510 Patent indicates that its title is “Word Checking Tool for Controlling the Language Content in Documents Using Dictionaries with Modifyable Status Fields.” The face of the ‘510 Patent also indicates a filing date of January 27, 1998 and an issue date of August 24, 2004. SafeNet denies any remaining allegations of Paragraph 68.

69. SafeNet lacks knowledge sufficient to form a belief as to the truth or falsity of the allegation that Plaintiff is the assignee of the '510 Patent, or that Plaintiff has standing to bring this lawsuit for infringement of the '510 Patent, and therefore denies this allegation. SafeNet denies any remaining allegations of Paragraph 69.

70. SafeNet admits that the claims of the '510 Patent, as properly construed as a matter of law, determine the scope of the '510 Patent and that the specific language recited in Paragraph 70 of the Complaint does not appear in the '510 Patent. SafeNet denies any remaining allegations of Paragraph 70.

71. SafeNet denies that SafeNet has infringed (directly or indirectly) any valid claim of the '510 Patent. To the extent the allegations of Paragraph 71 are directed to other entities, SafeNet lacks sufficient information to form a belief as to their truth or falsity of the allegations, and therefore denies them.

72. The allegations of Paragraph 72 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 72 of the Complaint, and therefore denies them.

73. The allegations of Paragraph 73 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 73 of the Complaint, and therefore denies them.

74. The allegations of Paragraph 74 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 74 of the Complaint, and therefore denies them.

75. The allegations of Paragraph 75 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 75 of the Complaint, and therefore denies them.

76. The allegations of Paragraph 76 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 76 of the Complaint, and therefore denies them.

77. The allegations of Paragraph 77 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 77 of the Complaint, and therefore denies them.

78. The allegations of Paragraph 78 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 78 of the Complaint, and therefore denies them.

79. The allegations of Paragraph 79 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 79 of the Complaint, and therefore denies them.

80. The allegations of Paragraph 80 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 80 of the Complaint, and therefore denies them.

81. The allegations of Paragraph 81 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 81 of the Complaint, and therefore denies them.

82. The allegations of Paragraph 82 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 82 of the Complaint, and therefore denies them.

83. The allegations of Paragraph 83 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 83 of the Complaint, and therefore denies them.

84. The allegations of Paragraph 84 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 84 of the Complaint, and therefore denies them.

85. The allegations of Paragraph 85 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 85 of the Complaint, and therefore denies them.

86. The allegations of Paragraph 86 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 86 of the Complaint, and therefore denies them.

87. The allegations of Paragraph 87 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 87 of the Complaint, and therefore denies them.

88. The allegations of Paragraph 88 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 88 of the Complaint, and therefore denies them.

89. The allegations of Paragraph 89 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 89 of the Complaint, and therefore denies them.

90. The allegations of Paragraph 90 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 90 of the Complaint, and therefore denies them.

91. The allegations of Paragraph 91 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 91 of the Complaint, and therefore denies them.

92. The allegations of Paragraph 92 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 92 of the Complaint, and therefore denies them.

93. The allegations of Paragraph 93 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 93 of the Complaint, and therefore denies them.

94. The allegations of Paragraph 94 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 94 of the Complaint, and therefore denies them.

95. The allegations of Paragraph 95 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 95 of the Complaint, and therefore denies them.

96. The allegations of Paragraph 96 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 96 of the Complaint, and therefore denies them.

97. The allegations of Paragraph 97 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 97 of the Complaint, and therefore denies them.

98. The allegations of Paragraph 98 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 98 of the Complaint, and therefore denies them.

99. The allegations of Paragraph 99 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 99 of the Complaint, and therefore denies them.

100. The allegations of Paragraph 100 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 100 of the Complaint, and therefore denies them.

101. The allegations of Paragraph 101 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 101 of the Complaint, and therefore denies them.

102. The allegations of Paragraph 102 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 102 of the Complaint, and therefore denies them.

103. The allegations of Paragraph 103 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 103 of the Complaint, and therefore denies them.

104. The allegations of Paragraph 104 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 104 of the Complaint, and therefore denies them.

105. The allegations of Paragraph 105 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 105 of the Complaint, and therefore denies them.

106. The allegations of Paragraph 106 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 106 of the Complaint, and therefore denies them.

107. The allegations of Paragraph 107 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 107 of the Complaint, and therefore denies them.

108. The allegations of Paragraph 108 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 108 of the Complaint, and therefore denies them.

109. The allegations of Paragraph 109 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 109 of the Complaint, and therefore denies them.

110. The allegations of Paragraph 110 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 110 of the Complaint, and therefore denies them.

111. The allegations of Paragraph 111 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 111 of the Complaint, and therefore denies them.

112. The allegations of Paragraph 112 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 112 of the Complaint, and therefore denies them.

113. The allegations of Paragraph 113 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 113 of the Complaint, and therefore denies them.

114. The allegations of Paragraph 114 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 114 of the Complaint, and therefore denies them.

115. The allegations of Paragraph 115 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 115 of the Complaint, and therefore denies them.

116. The allegations of Paragraph 116 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 116 of the Complaint, and therefore denies them.

117. The allegations of Paragraph 117 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 117 of the Complaint, and therefore denies them.

118. The allegations of Paragraph 118 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 118 of the Complaint, and therefore denies them.

119. The allegations of Paragraph 119 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 119 of the Complaint, and therefore denies them.

120. The allegations of Paragraph 120 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 120 of the Complaint, and therefore denies them.

121. The allegations of Paragraph 121 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 121 of the Complaint, and therefore denies them.

122. The allegations of Paragraph 122 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 122 of the Complaint, and therefore denies them.

123. The allegations of Paragraph 123 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 123 of the Complaint, and therefore denies them.

124. The allegations of Paragraph 124 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 124 of the Complaint, and therefore denies them.

125. The allegations of Paragraph 125 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 125 of the Complaint, and therefore denies them.

126. The allegations of Paragraph 126 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 126 of the Complaint, and therefore denies them.

127. The allegations of Paragraph 127 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 127 of the Complaint, and therefore denies them.

128. The allegations of Paragraph 128 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 128 of the Complaint, and therefore denies them.

129. The allegations of Paragraph 129 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 129 of the Complaint, and therefore denies them.

130. The allegations of Paragraph 130 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 130 of the Complaint, and therefore denies them.

131. The allegations of Paragraph 131 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 131 of the Complaint, and therefore denies them.

132. The allegations of Paragraph 132 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 132 of the Complaint, and therefore denies them.

133. The allegations of Paragraph 133 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 133 of the Complaint, and therefore denies them.

134. The allegations of Paragraph 134 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 134 of the Complaint, and therefore denies them.

135. The allegations of Paragraph 135 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 135 of the Complaint, and therefore denies them.

136. The allegations of Paragraph 136 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 136 of the Complaint, and therefore denies them.

137. The allegations of Paragraph 137 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 137 of the Complaint, and therefore denies them.

138. The allegations of Paragraph 138 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 138 of the Complaint, and therefore denies them.

139. The allegations of Paragraph 139 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 139 of the Complaint, and therefore denies them.

140. The allegations of Paragraph 140 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 140 of the Complaint, and therefore denies them.

141. The allegations of Paragraph 141 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 141 of the Complaint, and therefore denies them.

142. The allegations of Paragraph 142 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 142 of the Complaint, and therefore denies them.

143. The allegations of Paragraph 143 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 143 of the Complaint, and therefore denies them.

144. The allegations of Paragraph 144 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 144 of the Complaint, and therefore denies them.

145. The allegations of Paragraph 145 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 145 of the Complaint, and therefore denies them.

146. The allegations of Paragraph 146 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 146 of the Complaint, and therefore denies them.

147. The allegations of Paragraph 147 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 147 of the Complaint, and therefore denies them.

148. The allegations of Paragraph 148 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 148 of the Complaint, and therefore denies them.

149. The allegations of Paragraph 149 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 149 of the Complaint, and therefore denies them.

150. The allegations of Paragraph 150 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 150 of the Complaint, and therefore denies them.

151. The allegations of Paragraph 151 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 151 of the Complaint, and therefore denies them.

152. The allegations of Paragraph 152 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 152 of the Complaint, and therefore denies them.

153. The allegations of Paragraph 153 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 153 of the Complaint, and therefore denies them.

154. The allegations of Paragraph 154 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 154 of the Complaint, and therefore denies them.

155. The allegations of Paragraph 155 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 155 of the Complaint, and therefore denies them.

156. The allegations of Paragraph 156 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 156 of the Complaint, and therefore denies them.

157. The allegations of Paragraph 157 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 157 of the Complaint, and therefore denies them.

158. The allegations of Paragraph 158 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 158 of the Complaint, and therefore denies them.

159. The allegations of Paragraph 159 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 159 of the Complaint, and therefore denies them.

160. The allegations of Paragraph 160 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 160 of the Complaint, and therefore denies them.

161. The allegations of Paragraph 161 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 161 of the Complaint, and therefore denies them.

162. The allegations of Paragraph 162 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 162 of the Complaint, and therefore denies them.

163. The allegations of Paragraph 163 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 163 of the Complaint, and therefore denies them.

164. The allegations of Paragraph 164 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 164 of the Complaint, and therefore denies them.

165. The allegations of Paragraph 165 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 165 of the Complaint, and therefore denies them.

166. The allegations of Paragraph 166 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 166 of the Complaint, and therefore denies them.

167. The allegations of Paragraph 167 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 167 of the Complaint, and therefore denies them.

168. The allegations of Paragraph 168 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 168 of the Complaint, and therefore denies them.

169. The allegations of Paragraph 169 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 169 of the Complaint, and therefore denies them.

170. The allegations of Paragraph 170 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 170 of the Complaint, and therefore denies them.

171. The allegations of Paragraph 171 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 171 of the Complaint, and therefore denies them.

172. The allegations of Paragraph 172 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 172 of the Complaint, and therefore denies them.

173. The allegations of Paragraph 173 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 173 of the Complaint, and therefore denies them.

174. The allegations of Paragraph 174 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 174 of the Complaint, and therefore denies them.

175. The allegations of Paragraph 175 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 175 of the Complaint, and therefore denies them.

176. The allegations of Paragraph 176 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 176 of the Complaint, and therefore denies them.

177. The allegations of Paragraph 177 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 177 of the Complaint, and therefore denies them.

178. The allegations of Paragraph 178 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 178 of the Complaint, and therefore denies them.

179. The allegations of Paragraph 179 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 179 of the Complaint, and therefore denies them.

180. The allegations of Paragraph 180 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 180 of the Complaint, and therefore denies them.

181. The allegations of Paragraph 181 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 181 of the Complaint, and therefore denies them.

182. The allegations of Paragraph 182 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 182 of the Complaint, and therefore denies them.

183. The allegations of Paragraph 183 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 183 of the Complaint, and therefore denies them.

184. The allegations of Paragraph 184 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 184 of the Complaint, and therefore denies them.

185. The allegations of Paragraph 185 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 185 of the Complaint, and therefore denies them.

186. The allegations of Paragraph 186 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 186 of the Complaint, and therefore denies them.

187. The allegations of Paragraph 187 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 187 of the Complaint, and therefore denies them.

188. The allegations of Paragraph 188 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 188 of the Complaint, and therefore denies them.

189. The allegations of Paragraph 189 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 189 of the Complaint, and therefore denies them.

190. The allegations of Paragraph 190 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 190 of the Complaint, and therefore denies them.

191. The allegations of Paragraph 191 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 191 of the Complaint, and therefore denies them.

192. The allegations of Paragraph 192 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 192 of the Complaint, and therefore denies them.

193. The allegations of Paragraph 193 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 193 of the Complaint, and therefore denies them.

194. The allegations of Paragraph 194 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 194 of the Complaint, and therefore denies them.

195. The allegations of Paragraph 195 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 195 of the Complaint, and therefore denies them.

196. The allegations of Paragraph 196 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 196 of the Complaint, and therefore denies them.

197. The allegations of Paragraph 197 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 197 of the Complaint, and therefore denies them.

198. The allegations of Paragraph 198 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 198 of the Complaint, and therefore denies them.

199. The allegations of Paragraph 199 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 199 of the Complaint, and therefore denies them.

200. The allegations of Paragraph 200 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 200 of the Complaint, and therefore denies them.

201. SafeNet denies the allegations of Paragraph 201.

202. SafeNet denies the allegations of Paragraph 202.

203. SafeNet denies the allegations of Paragraph 203.

204. SafeNet denies the allegations of Paragraph 204.

205. The allegations of Paragraph 205 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 205 of the Complaint, and therefore denies them.

206. The allegations of Paragraph 206 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 206 of the Complaint, and therefore denies them.

207. The allegations of Paragraph 207 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 207 of the Complaint, and therefore denies them.

208. The allegations of Paragraph 208 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 208 of the Complaint, and therefore denies them.

209. The allegations of Paragraph 209 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 209 of the Complaint, and therefore denies them.

210. The allegations of Paragraph 210 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 210 of the Complaint, and therefore denies them.

211. The allegations of Paragraph 211 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 211 of the Complaint, and therefore denies them.

212. The allegations of Paragraph 212 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 212 of the Complaint, and therefore denies them.

213. The allegations of Paragraph 213 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 213 of the Complaint, and therefore denies them.

214. The allegations of Paragraph 214 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 214 of the Complaint, and therefore denies them.

215. The allegations of Paragraph 215 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 215 of the Complaint, and therefore denies them.

216. The allegations of Paragraph 216 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 216 of the Complaint, and therefore denies them.

217. The allegations of Paragraph 217 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 217 of the Complaint, and therefore denies them.

218. The allegations of Paragraph 218 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 218 of the Complaint, and therefore denies them.

219. The allegations of Paragraph 219 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 219 of the Complaint, and therefore denies them.

220. The allegations of Paragraph 220 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 220 of the Complaint, and therefore denies them.

221. The allegations of Paragraph 221 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 221 of the Complaint, and therefore denies them.

222. The allegations of Paragraph 222 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 222 of the Complaint, and therefore denies them.

223. The allegations of Paragraph 223 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 223 of the Complaint, and therefore denies them.

224. The allegations of Paragraph 224 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 224 of the Complaint, and therefore denies them.

225. The allegations of Paragraph 225 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 225 of the Complaint, and therefore denies them.

226. The allegations of Paragraph 226 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 226 of the Complaint, and therefore denies them.

227. The allegations of Paragraph 227 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 227 of the Complaint, and therefore denies them.

228. The allegations of Paragraph 228 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 228 of the Complaint, and therefore denies them.

229. The allegations of Paragraph 229 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 229 of the Complaint, and therefore denies them.

230. The allegations of Paragraph 230 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 230 of the Complaint, and therefore denies them.

231. The allegations of Paragraph 231 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 231 of the Complaint, and therefore denies them.

232. The allegations of Paragraph 232 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 232 of the Complaint, and therefore denies them.

233. The allegations of Paragraph 233 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 233 of the Complaint, and therefore denies them.

234. The allegations of Paragraph 234 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 234 of the Complaint, and therefore denies them.

235. The allegations of Paragraph 235 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 235 of the Complaint, and therefore denies them.

236. The allegations of Paragraph 236 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 236 of the Complaint, and therefore denies them.

237. The allegations of Paragraph 237 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 237 of the Complaint, and therefore denies them.

238. The allegations of Paragraph 238 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 238 of the Complaint, and therefore denies them.

239. The allegations of Paragraph 239 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 239 of the Complaint, and therefore denies them.

240. The allegations of Paragraph 240 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 240 of the Complaint, and therefore denies them.

241. The allegations of Paragraph 241 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 241 of the Complaint, and therefore denies them.

242. The allegations of Paragraph 242 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 242 of the Complaint, and therefore denies them.

243. The allegations of Paragraph 243 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 243 of the Complaint, and therefore denies them.

244. The allegations of Paragraph 244 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 244 of the Complaint, and therefore denies them.

245. The allegations of Paragraph 245 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 245 of the Complaint, and therefore denies them.

246. The allegations of Paragraph 246 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 246 of the Complaint, and therefore denies them.

247. The allegations of Paragraph 247 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 247 of the Complaint, and therefore denies them.

248. The allegations of Paragraph 248 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 248 of the Complaint, and therefore denies them.

249. The allegations of Paragraph 249 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 249 of the Complaint, and therefore denies them.

250. The allegations of Paragraph 250 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 250 of the Complaint, and therefore denies them.

251. The allegations of Paragraph 251 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 251 of the Complaint, and therefore denies them.

252. The allegations of Paragraph 252 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 252 of the Complaint, and therefore denies them.

253. The allegations of Paragraph 253 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 253 of the Complaint, and therefore denies them.

254. The allegations of Paragraph 254 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 254 of the Complaint, and therefore denies them.

255. The allegations of Paragraph 255 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 255 of the Complaint, and therefore denies them.

256. The allegations of Paragraph 256 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 256 of the Complaint, and therefore denies them.

257. The allegations of Paragraph 257 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 257 of the Complaint, and therefore denies them.

258. The allegations of Paragraph 258 of the Complaint relate solely to another defendant. Accordingly, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 258 of the Complaint, and therefore denies them.

259. SafeNet denies the allegations of Paragraph 259 with respect to SafeNet. With respect to the other defendants, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 259 of the Complaint, and therefore denies them.

260. SafeNet admits that the Plaintiff purports to have reserved the right to take discovery from Defendants relative to their awareness/notice of the '510 Patent prior to the filing of suit. SafeNet denies the remaining allegations of Paragraph 260 with respect to SafeNet. With respect to the other defendants, SafeNet lacks sufficient information to form a belief as to

the truth or falsity of the allegations set forth in Paragraph 260 of the Complaint, and therefore denies them.

261. SafeNet admits that the Plaintiff purports to reserve the right to allege willful infringement in the future against one or more defendants for alleged infringement of the '510 Patent. SafeNet denies that SafeNet has infringed the '510 Patent, willfully or otherwise. SafeNet denies the remaining allegations of Paragraph 259 with respect to SafeNet. With respect to the other defendants, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 259 of the Complaint, and therefore denies them.

262. SafeNet admits to having been served with a copy of the Complaint, which purports to include a copy of the '510 Patent. SafeNet denies the remaining allegations of Paragraph 259 with respect to SafeNet. With respect to the other defendants, SafeNet lacks sufficient information to form a belief as to the truth or falsity of the allegations set forth in Paragraph 259 of the Complaint, and therefore denies them.

PRAYER FOR RELIEF

SafeNet denies that Plaintiff is entitled to be awarded any of the relief sought in Paragraphs 1-7 of its Prayer for Relief against SafeNet. Plaintiff's Prayer for Relief with regard to SafeNet should, therefore, be denied in its entirety and with prejudice, and Plaintiff should take nothing. With respect to the other defendants, SafeNet lacks sufficient information to form a belief as to whether Plaintiff is entitled to the relief sought or any relief whatsoever, and on that basis denies the same.

DEMAND FOR JURY TRIAL

SafeNet admits the Plaintiff has demanded a jury trial. SafeNet demands a jury trial for all issues triable by a jury.

ADDITIONAL DEFENSES

SafeNet repeats the responses to the allegations of Paragraphs 1-262 of the Complaint as set forth above and incorporates them herein by reference. SafeNet asserts the following Additional Defenses listed below. SafeNet reserves the right to add additional defenses consistent with the facts discovered in the case.

FIRST ADDITIONAL DEFENSE

1. SafeNet has failed to state a claim upon which relief can be granted.

SECOND ADDITIONAL DEFENSE

2. SafeNet has not infringed and is not infringing, either literally or under the doctrine of equivalents, any valid and enforceable claim of the '510 Patent. SafeNet has not contributed to and is not contributing to any infringement of any valid and enforceable claim of the '510 Patent and has not induced and is not inducing infringement of any valid and enforceable claim of the '510 Patent.

THIRD ADDITIONAL DEFENSE

3. One or more of the claims of the '510 Patent are invalid because they fail to satisfy one or more conditions for patentability specified in Title 35 of the United States Code, including, inter alia, §§ 41, 101, 102, 103, 112, 115, 116, and/or 256.

FOURTH ADDITIONAL DEFENSE

4. Plaintiff's claims are barred, in whole or in part, under the equitable doctrines of laches, waiver, and/or estoppel.

FIFTH ADDITIONAL DEFENSE

5. By reason of proceedings in the United States Patent and Trademark Office, and by reasons of the statements, admissions, and/or amendments made by the applicants or on the applicants' behalf, Plaintiff is estopped from construing any claim of the '510 Patent to cover any SafeNet product or service that is alleged to infringe the '510 Patent.

SIXTH ADDITIONAL DEFENSE

6. Plaintiff's claims are limited, in whole or in part, by 35 U.S.C. §§ 286, 287, and/or 288.

SEVENTH ADDITIONAL DEFENSE

7. The Plaintiff is not entitled to injunctive relief because any injury to the Plaintiff is not immediate or irreparable, and the Plaintiff has an adequate remedy at law.

EIGHTH ADDITIONAL DEFENSE

8. The Defendants are improperly joined.

NINTH ADDITIONAL DEFENSE

9. Plaintiff's claims are barred by 28 U.S.C. § 1498 to the extent that any products accused of infringement in this action have been used or manufactured by or for the United States.

TENTH ADDITIONAL DEFENSE

10. WordCheck Tech has failed to plead and meet the requirements of 35 U.S.C. § 284 for enhanced damages.

ELEVENTH ADDITIONAL DEFENSE

11. WordCheck Tech's claims for infringement of the '510 patent are precluded in whole or in part (i) to the extent that any allegedly infringing products are supplied, directly or indirectly, to SafeNet by an entity or entities having express or implied licenses to the '510 patent and/or (ii) under the doctrine of patent exhaustion.

RESERVATION OF ADDITIONAL DEFENSES

12. SafeNet reserves the right to assert additional defenses based on future discovery, consistent with the facts discovered in this case.

SAFENET'S COUNTERCLAIMS

SafeNet, for its counterclaims against Plaintiff, alleges as follows:

THE PARTIES

1. SafeNet is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business at 4690 Millennium Drive, Belcamp MD 21017.

2. Plaintiff purports in its Complaint to be a Nevada Limited Liability Company with its principal place of business in Longview, Texas.

JURISDICTION AND VENUE

3. The counterclaims include claims for declaratory judgment of patent non-infringement and patent invalidity, and jurisdiction is proper under the Federal Declaratory Judgment Act, 28 U.S.C. §§ 2201 and 2202, the Patent Laws of the United States, 35 U.S.C. §§ 1 *et seq.*, concerning actions related to patents, and 28 U.S.C. §§ 1331, 1332, and 1338.

4. Venue is proper in this Court under 28 U.S.C. §§ 1391.

5. This Court has personal jurisdiction over WordCheck Tech by virtue of Plaintiffs' filing of the Complaint against SafeNet in this Court.

GENERAL ALLEGATIONS

6. On September 7, 2010, Plaintiff filed the Complaint naming SafeNet as a defendant.

7. Plaintiff has alleged that SafeNet infringes the '510 Patent.

8. An actual and justiciable case or controversy has arisen and presently exists between Plaintiff and SafeNet to which SafeNet desires a declaration of rights pursuant to 28 U.S.C. § 2201(a) and Rule 57 of the Federal Rules of Civil Procedure.

COUNT ONE:
DECLARATORY RELIEF REGARDING NON-INFRINGEMENT OF
U.S. PATENT NO. 6,782,510

9. SafeNet does not and has not infringed (literally or by equivalents), contributed to the infringement, induced infringement, or willfully infringed any valid claim of the '510 Patent.

10. SafeNet is entitled to a declaratory judgment that it is not infringing any valid claim of the '510 Patent literally or under the Doctrine of Equivalents, that it is not infringing any valid claim of the '510 Patent contributorily, that it is not inducing infringement of any valid claim of the '510 Patent, and that it is not willfully infringing any valid claim of the '510 Patent. SafeNet is further entitled to a declaratory judgment that it has not previously infringed any valid claim of the '510 Patent literally or under the Doctrine of Equivalents, that it has not previously infringed any valid claim of the '510 Patent contributorily, that it has not previously induced infringement of any valid claim of the '510 Patent, and that it has not willfully infringed any valid claim of the '510 Patent.

COUNT TWO:
DECLARATORY RELIEF REGARDING INVALIDITY OF
U.S. PATENT NO. 6,782,510

11. One or more claims of the '510 Patent are invalid for failure to comply with the provisions of the Patent Laws 35 U.S.C. §§ 1, et seq., including, but not limited to, one or more of 35 U.S.C. §§ 41, 101, 102, 103, 112, 115, 116, and/or 256.

12. SafeNet is entitled to a declaratory judgment that one or more claims of the '510 Patent are invalid.

PRAYER FOR RELIEF

WHEREFORE, SafeNet respectfully prays that this Court:

A. Dismiss with prejudice the Complaint in its entirety and award SafeNet nothing by its Complaint;

B. Adjudge, declare, and decree that SafeNet has not infringed, and is not infringing, either literally or by equivalents, any valid claim of the '510 Patent;

C. Adjudge, declare, and decree that SafeNet has not induced, and is not inducing, infringement of any valid claim of the '510 Patent;

D. Adjudge, declare, and decree that SafeNet has not contributed to, and is not contributing to, the infringement of any valid claim of the '510 Patent;

E. Adjudge, declare, and decree that SafeNet has not willfully infringed, and is not willfully infringing, any valid claim of the '510 Patent;

F. Adjudge, declare, and decree that one or more claims of the '510 Patent are invalid;

G. Adjudge, declare, and decree that Plaintiff is not entitled to relief for alleged infringement of any valid claim of the '510 Patent where the alleged infringement is based upon an SafeNet product;

H. Permanently enjoin Plaintiff, its successors, and assigns, and anyone acting in concert therewith or on its behalf, from attempting to enforce the '510 Patent against SafeNet or any parent, affiliate, or subsidiary of SafeNet, or its respective officers, agents, employees, successors, and assigns;

I. Enter a judgment against Plaintiff and in favor of SafeNet in all respects;

J. Find this case exceptional and award reasonable attorneys' fees, costs, expenses, and prejudgment interest to SafeNet pursuant to 35 U.S.C. § 285;

K. Award the costs of this case to SafeNet; and

L. Award to SafeNet any further general or special relief to which SafeNet is entitled.

Dated: November 18, 2010

Respectfully submitted,

By: /s/ Douglas M. Kubehl

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ATTORNEYS FOR SAFENET, INC.

**CERTIFICATE OF SERVICE
PURSUANT TO LOCAL RULE CV-5(D)**

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served this 18th day of November, 2010, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail and first class mail on this same date.

/s/ Douglas M. Kubehl

Douglas M. Kubehl